

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Jermaine Jenkins

Case: 2:21-mj-30108

Assigned To : Unassigned

Assign. Date : 3/5/2021

CMP: SEALED MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 2020 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1343	Wire Fraud
18 U.S.C. § 1028A(a)(1)	Aggravated Identity theft

This criminal complaint is based on these facts:

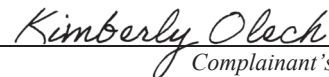
See Attached Affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: March 5, 2021

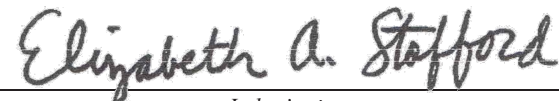
City and state: Detroit, MI



Complainant's signature

Special Agent Kimberly Olech

Printed name and title



Judge's signature

Elizabeth Stafford, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT**

I, Kimberly Olech, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent, with the Federal Bureau of Investigation and have experience in the investigation, apprehension and prosecution of individuals involved in federal criminal offenses, the use of cellular devices to commit those offenses and the available technology that can be used by law enforcement to assist in identifying the users of cellular devices and their location.
2. I am submitting this affidavit in support of a criminal complaint alleging that JERMAINE JENKINS has violated Title 18 United States Code Section 1343, wire fraud, and Title 18 United States Code Section 1028A(a)(1), aggravated identity theft. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are

necessary to establish probable cause to believe the defendant committed the offense alleged in the complaint.

3. The facts in this affidavit come from my personal observations, training, experience, and information obtained from other agents and witnesses.

BACKGROUND ON INVESTIGATION

4. The FBI Violent Gang Task Force (VGTF) is conducting a criminal investigation concerning the “It’s Just Us” street gang for violations of Title 18, United States Code, Section 1962 (Racketeering Influenced Corrupt Organizations Act); Title 18, United States Code, Section 1959 (Violent Crimes in Aid of Racketeering); and Title 21, United States Code, Sections 841 and 846 (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances).
5. A federal grand jury has indicted IJU leader, Duane Peterson, and IJU members, Melvin Brown and Demonte Foster, with racketeering conspiracy in violation of Title 18 U.S.C. Section 1962(d) for violent, IJU-related gang activity.

6. A federal grand jury has also indicted multiple additional IJU members, including Deshawn Peterson, for conspiring to distribute heroin as part of IJU's narcotics trafficking enterprise.
7. There are multiple other IJU members under investigation, including JERMAINE JENKINS. The photo below, which was taken from an IJU member's social media page, shows JENKINS (back row, far left, wearing an olive green sweatshirt) with fellow-IJU members. The

caption reads, “...iju is my crew...lafamilia”:



8. During the course of the FBI’s investigation, agents have received information from multiple sources which detail JENKINS’s involvement in IJU.
9. For instance, on March 6, 2018, JENKINS was present with other IJU members during the choking and punching of a woman inside the Liquor Island convenience store in Detroit. Surveillance footage

obtained from the store captures JENKINS with fellow IJU members (JENKINS is wearing a red and black jacket):



10. The assault ended with one IJU member pistol-whipping an innocent bystander who was watching the assault from his car, and another IJU member shooting at the car striking a separate passenger in the torso.
11. Additionally, according to Michigan Department of Corrections records, between March and June of 2020, JENKINS has placed approximately \$750 on the prison commissary account of IJU leader, Duane Peterson, who is serving a sentence for attempted murder.

EVIDENCE ON DESHAWN PETERSON'S PHONE

12. On October 22, 2020, agents executed a federal arrest warrant at IJU member, Deshawn Peterson's, residence, located at XXXXXX Nottingham Road in Detroit. Agents seized one phone from Peterson during his arrest.
13. On October 26, 2020, a federal search warrant was obtained for Peterson's cellphone.
14. I reviewed the contents of the phone and discovered evidence of fraudulent financial activity. For instance, in one chat thread Peterson sent several messages to a phone registered to JERMAINE JENKINS. The messages contained photographs of debit cards issued from various state unemployment agencies. Some of the cards were in JERMAINE JENKINS's name. Other cards were in Deshawn Peterson's name. A number of cards were in the name of confirmed identity theft victim, P.W., and an additional suspected identity theft, T.M. Neither victim has an association with Detroit, or with Deshawn Peterson, or JENKINS.
15. Both the card in P.W.'s name, and one of the cards in Deshawn Peterson's name were used at the same location in Detroit,

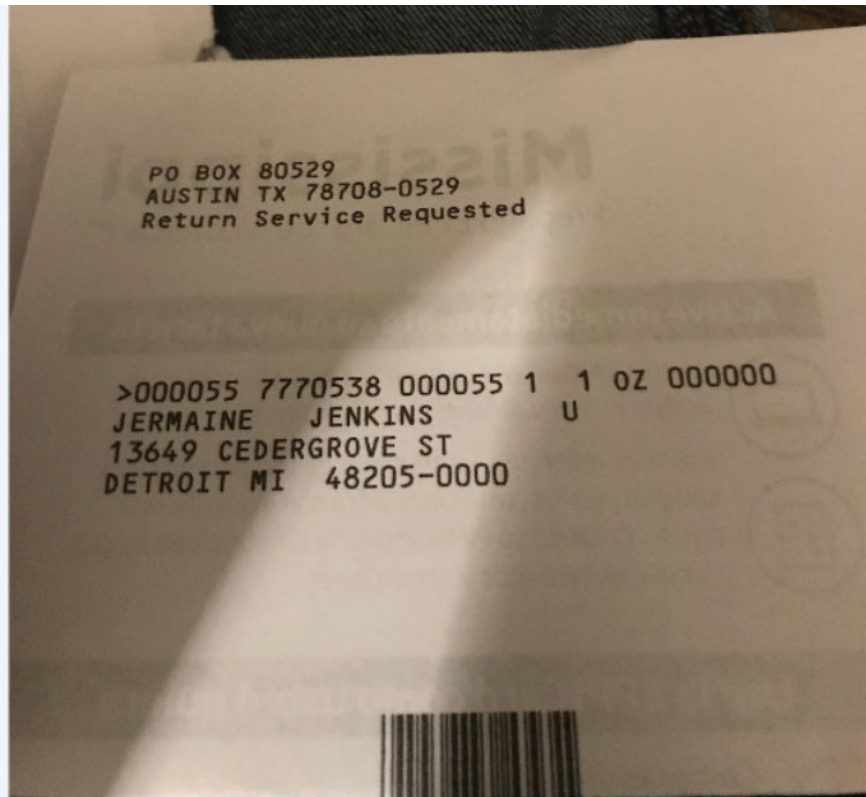
Michigan, on September 2, 2020, one minute apart. On each occasion, a sum of \$2,500 was withdrawn from each card. Based on my training and experience, two back-to-back financial transactions made at the same location involving a large amount of money indicates fraudulent activity.

16. Records obtained for the photo of the debit card issued in T.M.'s name by the State of Michigan indicated that the mailing address associated with the card is XXXXX Nottingham, Detroit, Michigan (the address at which Deshawn Peterson was arrested on January 12, 2021). Through open source records, I confirmed that T.M. lives in New Jersey and has never lived at the Nottingham address. Further, the e-mail associated with this account is TXXXXXXXXXXXXXXXXX458@YAHOO.COM. IJU members commonly use the numbers "458" to indicate their affiliation with the gang. Therefore, the incorporation of these numbers into this email address linked to a fraudulent debit card indicates an IJU member likely created the email address in order to further the criminal scheme. A sum of \$7,320 was loaded onto the card between July 2, 2020, and November 3, 2020.

17. One of the photos on Deshawn Peterson's phone depicted a card in JENKINS's name which was issued out of the State of Arizona (see below).

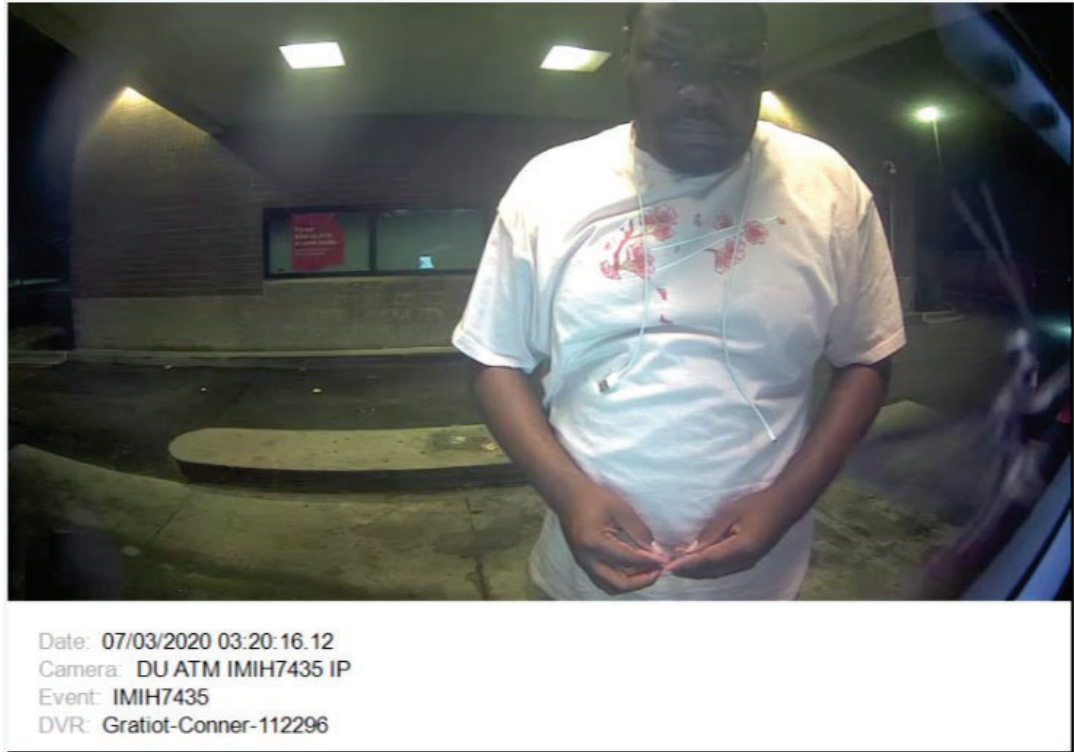


18. The two photos below relate to a second debit card issued in JENKINS's name by the State of Mississippi with an associated mailing address of the XXXXX Cedargrove, Detroit, Michigan. According to my investigation, Jenkins has no known association with Mississippi or Arizona.

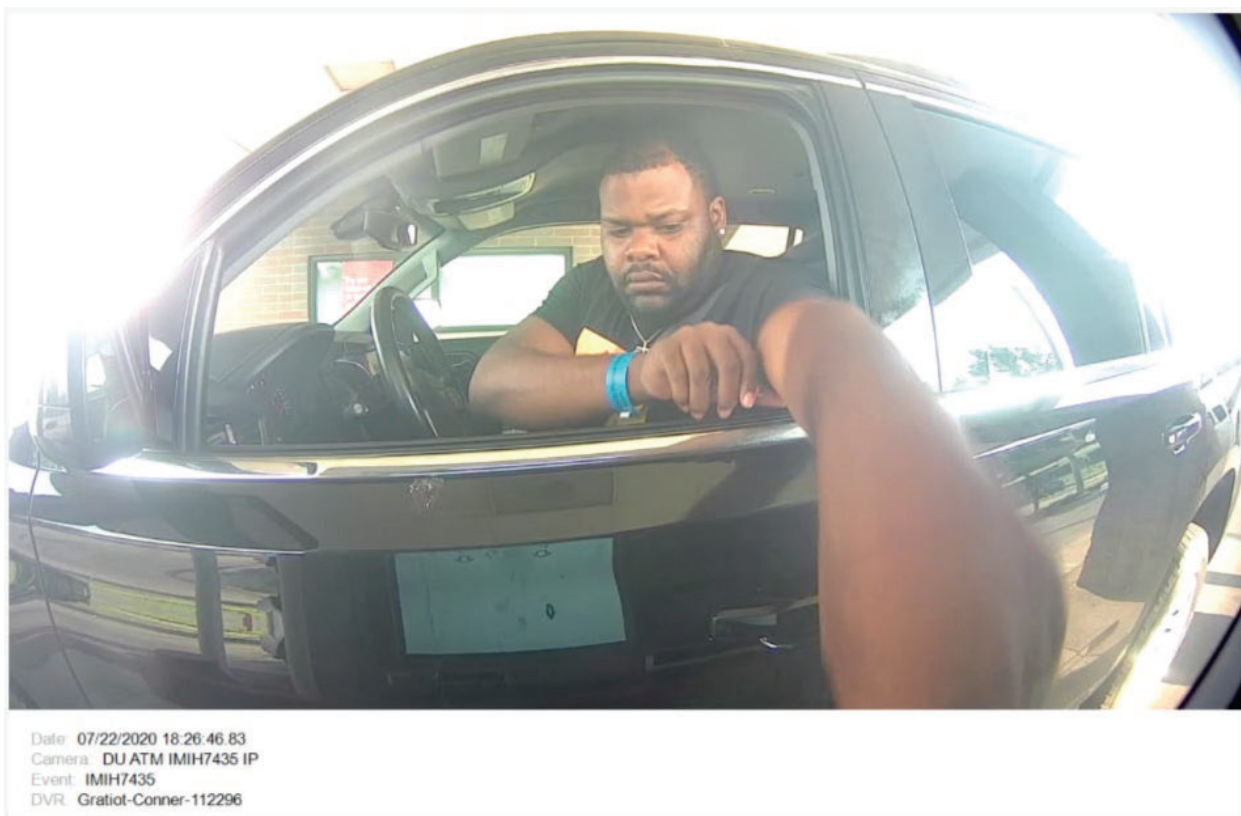


USE OF THE DEBIT CARDS

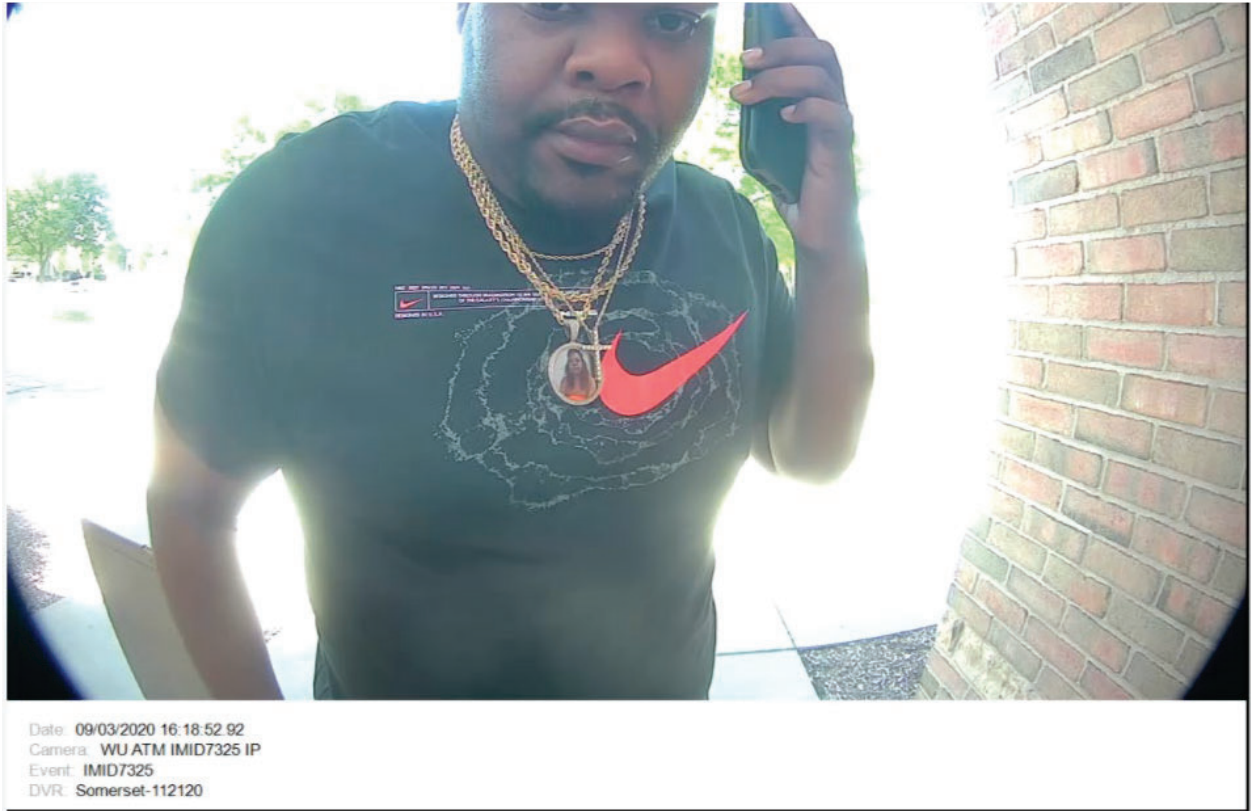
19. I subpoenaed multiple records from Bank of America (BOA) ATM surveillance in attempt to determine who was using the fraudulently-issued debit cards. BOA returned results of surveillance footage obtained from multiple ATM machines in southeast Michigan. A portion of these results is featured below:
 - a. A still shot photograph of JENKINS making a balance inquiry on July 3, 2020, at approximately 3:20 a.m., from the BOA located at Gratiot/Connor in Detroit. JENKINS made this inquiry using the fraudulently-obtained debit card bearing identity theft victim, T.M.'s name (described above).



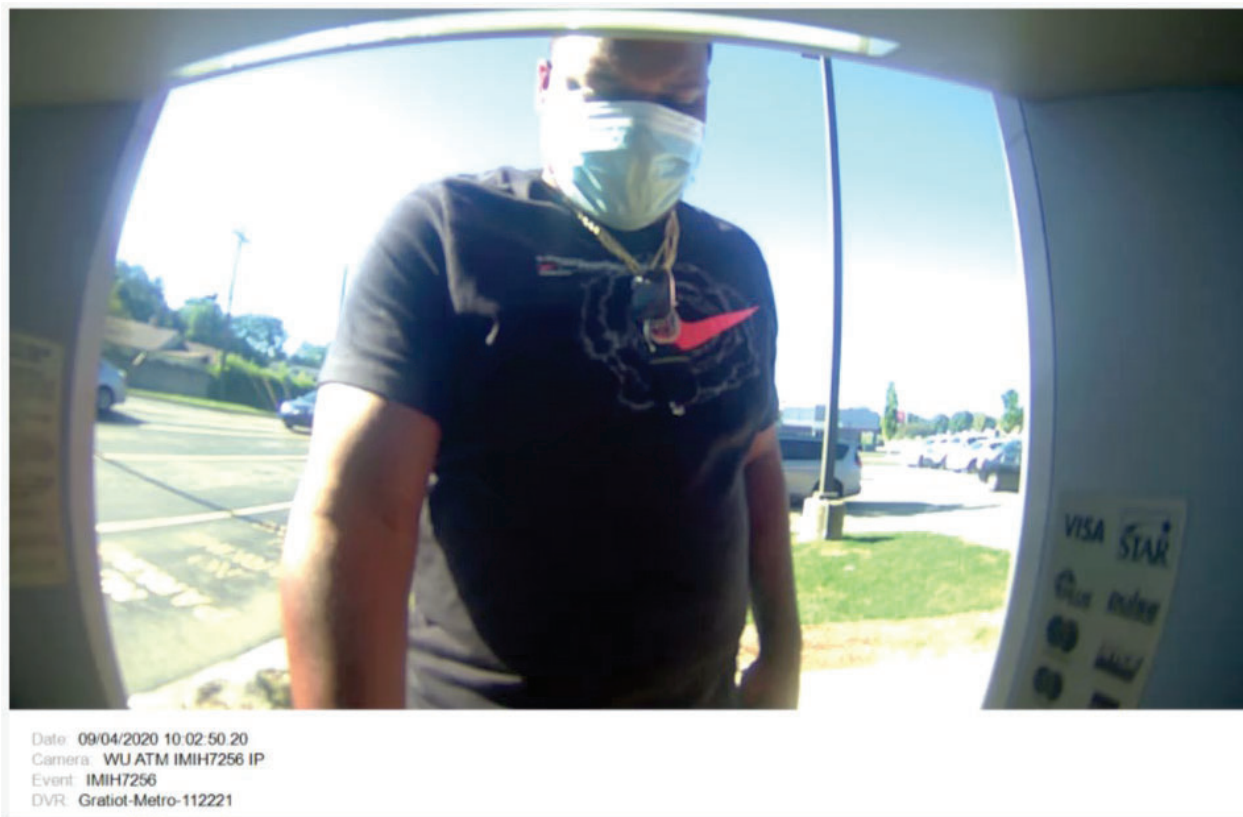
- b. A still shot photograph of JENKINS withdrawing \$500 on July 22, 2020, at approximately 6:26 p.m., from the BOA located at Gratiot/Connor in Detroit. JENKINS made the withdraw using the fraudulently-obtained debit card bearing identity theft victim, T.M.'s name (described above).



- c. A still shot photograph of JENKINS withdrawing \$500 on September 3, 2020, at approximately 4:18 p.m., from the BOA ATM located near The Somerset Collection, a high-end shopping mall, in Troy, Michigan. JENKINS made the withdraw using the fraudulently-obtained debit card bearing identity theft victim, P.W.'s name (described above).



d. A still shot photograph of JENKINS withdrawing \$1,000 on September 4, 2020, at approximately 10:02 a.m. from a BOA ATM at a location on Gratiot Avenue in Clinton Township, Michigan. JENKINS made the withdraw using the fraudulently-obtained debit card bearing identity theft victim, P.W.'s name (described above).



- e. A still shot photograph of JENKINS on September 4, 2020, at approximately 1:01 p.m., withdrawing \$320 from the BOA ATM located near The Somerset Collection, in Troy. JENKINS made the withdraw using the fraudulently-obtained debit card bearing identity theft victim, T.M.'s name (described above).



Date: 09/04/2020 13:01:17.84
Camera: OH WU 7325 IP
Event: Surveillance
DVR: Somerset-112120

- f. A still shot photograph of JENKINS on September 5, 2020, at approximately 3:06 p.m. withdrawing \$1,000 from a BOA ATM near The Somerset Collection, in Troy. JENKINS made the withdraw using the fraudulently-obtained debit card bearing identity theft victim, P.W.'s name (described above).



Date: 09/05/2020 15:06:50.50
Camera: WU ATM IMID7325 IP
Event: Surveillance
DVR: Somerset-112120

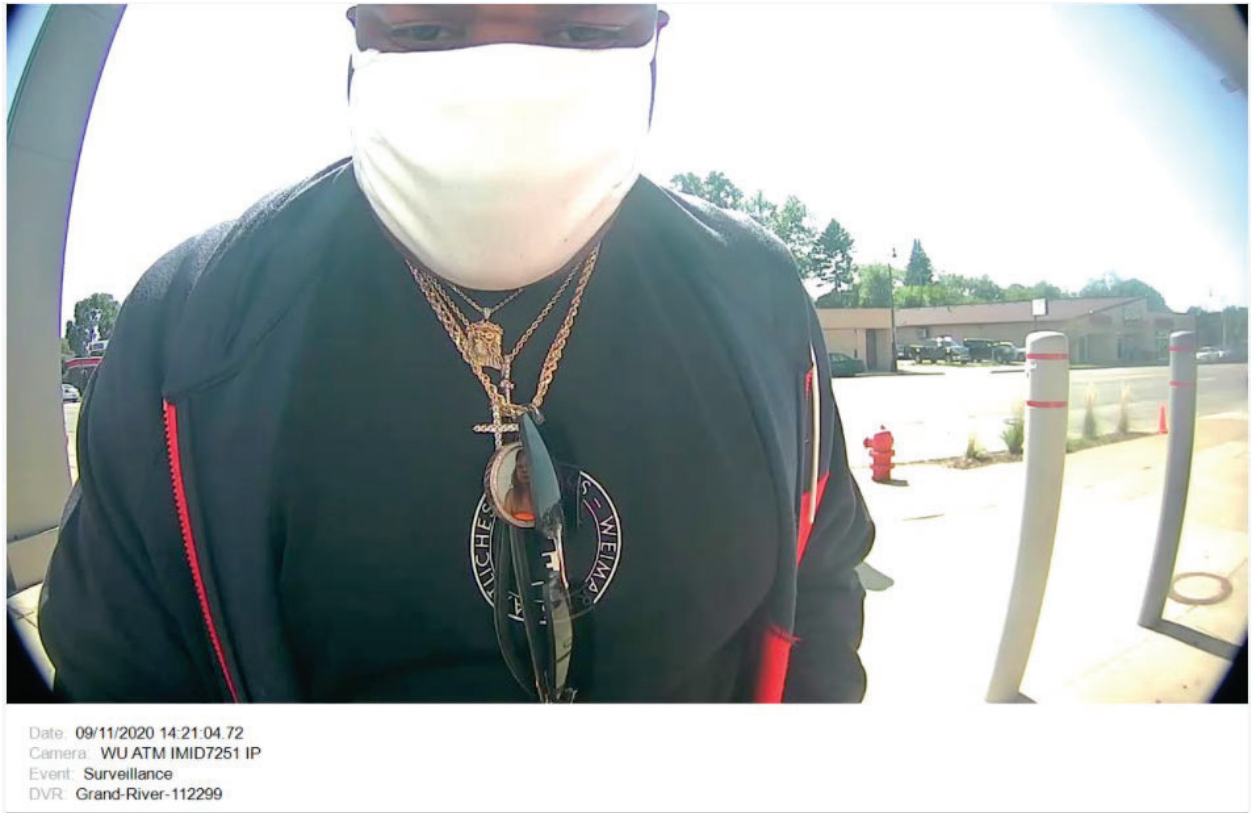
- g. A still shot photograph of JENKINS on September 8, 2020, at approximately 1:49 p.m. withdrawing \$1,000 from a BOA ATM at Gratiot/Conner in Detroit. JENKINS made the withdraw using the fraudulently-obtained debit card bearing identity theft victim, P.W.'s name (described above).



h. A still shot photograph of JENKINS on September 10, 2020, at approximately 8:50 p.m. withdrawing \$1,000 from a BOA ATM at Gratiot/Conner in Detroit. JENKINS made the withdraw using a fraudulently-obtained debit card, issued out of the State of Arizona, bearing Deshawn Peterson's name (described above).



- i. A still shot photograph of JENKINS on September 11, 2020, at approximately 2:21 p.m. withdrawing \$1,000 from a BOA ATM on Grand River in Detroit. JENKINS made the withdraw using a fraudulently-obtained debit card, issued out of the State of Arizona, bearing Deshawn Peterson's name (described above).

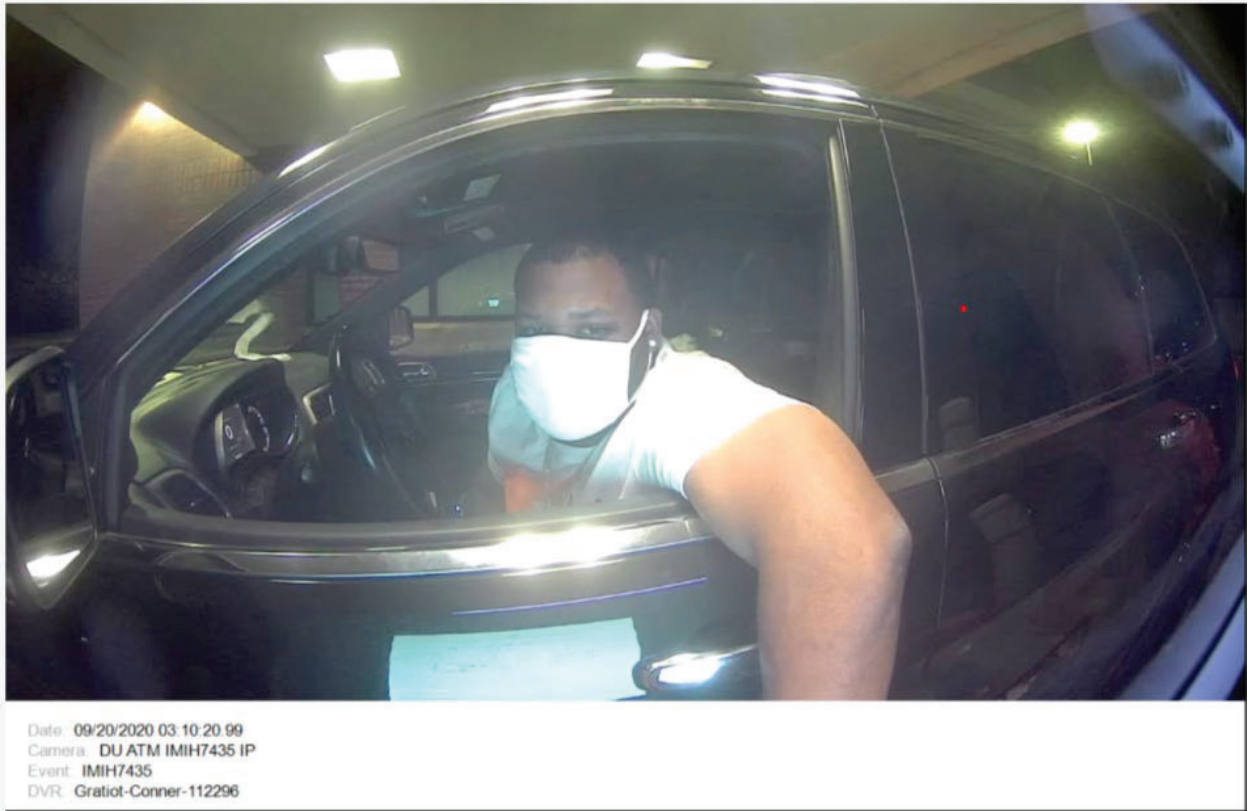


- j. A still shot photograph of JENKINS on September 20, 2020, at 3:03 a.m. withdrawing \$600 from a BOA ATM at Gratiot/Conner in Detroit. JENKINS made the withdraw using the fraudulently-obtained debit card bearing identity theft victim, T.M.'s name (described above).



Date: 09/20/2020 03:03:03.00
Camera: DU-ATM-IMID1102-IP
Event: Surveillance
DVR: Gratiot-Conner-112296

- j. A still shot photograph of JENKINS on September 20, 2020, at approximately 3:10 a.m. (seven minutes after the withdrawal detailed in paragraph j) withdrawing \$300 from a BOA ATM at Gratiot/Conner in Detroit. JENKINS made the withdraw using the fraudulently-obtained debit card bearing identity theft victim, T.M.'s name (described above).



SEARCH WARRANT AT DESHAWN PETERSON'S HOME

20. On January 12, 2021, the Detroit FBI Violent Gang Task Force (VGTF) executed a federal search warrant at Deshawn Peterson's residence in Detroit. At the time, Peterson was on pretrial release on case 20-cr-20448, the IJU gang and drug conspiracy matter. During the search, agents seized two phones, a firearm, and a debit card issued by Michigan unemployment services in the name of C.M. Peterson was arrested and indicted for aggravated identity theft, wire fraud, illegal possession of a firearm, and commission of a crime while on pretrial release (21-cr-20065, EDM). Both that case, and

the IJU gang and drug conspiracy matter (20-cr-20448) are currently pending before Judge Robert H. Cleland in this district.


21. During the search warrant, agents seized two phones which Peterson's girlfriend, Jasmine Joyce, claimed to own. Joyce admitted that Peterson uses the phones because his phone was seized in October 2020, when the FBI first arrested him for gang and drug activity. Joyce voluntarily signed a consent to search form for her two cell phones.
22. I examined the contents of both cell phones, one of which revealed text communications with JERMAINE JENKINS. One message contained a picture of a Michigan Unemployment Insurance Agency (MIUIA) debit card in the name of C.M. This is the same debit card that was seized from Deshawn Peterson's house during the January 12, 2021 search warrant.
23. On February 24, 2021, I spoke with C.M. by phone. He is a resident of the State of Georgia and has never filed for unemployment. He informed me he has no knowledge of or association with Deshawn Peterson, Jasmine Joyce, or JERMAINE JENKINS. Neither has he

traveled to the house on Nottingham in Detroit where the debit card in his name was found.

CONCLUSION

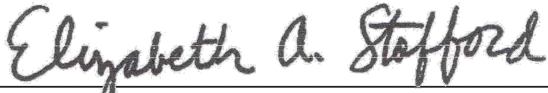
24. For the reasons stated above, I submit that there is probable cause to believe that JERMAINE JENKINS violated 18 U.S.C. § 1343, wire fraud, and 18 U.S.C. § 1028A(a)(1), aggravated identity theft.

Respectfully submitted,



Kimberly Olech, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence and/or by reliable electronic means.



Elizabeth Stafford
UNITED STATES MAGISTRATE JUDGE

March 5, 2021